

Message

From: Mucha, Teresa J (DEC) [teresa.mucha@dec.ny.gov]
Sent: 12/6/2018 6:48:19 PM
To: Ludmer, Margo [ludmer.margo@epa.gov]
Subject: FW: TCC

Hi Margo,

Please see item number 1 below. Ex. 5 (attorney work product); Ex. 7(a) DEC did not authorize direct discharge of the bermed water. Please let me know if you have any other questions.

Terri

Terri Mucha, Esq.



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From: Mucha, Teresa J (DEC)
Sent: Wednesday, November 21, 2018 12:04 PM
To: 'Ludmer, Margo' <ludmer.margo@epa.gov>
Subject: RE: TCC

Just to keep you in the loop, below are staff's comments that they are sending over:

- 1) We only allowed berm water to be discharged to the ground surface during the investigation and initial phase of the IRM. As soon as the interior of the berms were disturbed by the IRM the coal tar starting creating sheens and I made them pump the water and treat through the Main Plant system.
- 2) Page 2, Cut Pipes and Plastic Sheeting: the pipes near Tank 2 were cut during the IRM when the demolition of the tanks was still to be completed by TCC. The majority of the tar/water mixture that is there flowed out of the pipes (from the direction of the pump house), not the valve EPA refers to. It is possible that the valve is leaking, but most of the tar/water is from the pipes or what was already within the berm when the IRM started.
- 3) Page 4, Soil Pile Tarping: this is the IRM screened soil. This plan does not make it clear that the soil pile is related to the IRM and that it has been tested, and more importantly that it was derived from listed hazardous waste.
- 4) Page 4, Berm System Monitoring: I have calculated that the berms need 2 feet of freeboard.
- 5) Page 4, ACM Tanks: pipe wrap does contain ACM. TCC did a small asbestos abatement to cut the pipes connecting the tanks.

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From: Ludmer, Margo [<mailto:ludmer.margo@epa.gov>]
Sent: Wednesday, November 21, 2018 12:03 PM
To: Mucha, Teresa J (DEC) <teresa.mucha@dec.ny.gov>
Subject: RE: TCC

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Great. Thanks, Terri. I still have not heard back from the site team. I will follow up with them on your other question!

Margo B. Ludmer
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From: Mucha, Teresa J (DEC) <teresa.mucha@dec.ny.gov>
Sent: Wednesday, November 21, 2018 12:00 PM
To: Ludmer, Margo <ludmer.margo@epa.gov>
Subject: RE: TCC

As a follow up, Dale Desnoyers sent over the draft work plan with EPA's comments. DEC staff just had a couple clarifying points due to some assertions made by HW that they will be sending over to Peter L. as an FYI in case he found them helpful.

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From: Mucha, Teresa J (DEC)
Sent: Tuesday, November 20, 2018 4:42 PM
To: Ludmer, Margo <ludmer.margo@epa.gov>
Subject: Re: TCC

Great thanks Margo,

Ex. 5 (deliberative process; attorney work product)

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From: Ludmer, Margo <ludmer.margo@epa.gov>
Sent: Tuesday, November 20, 2018 4:29 PM
To: Mucha, Teresa J (DEC)
Subject: RE: TCC

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Hi Terri,

I forwarded your questions along to our site team and I am awaiting a response. It may be that folks are already traveling for the holidays, but I will make sure to follow up and get you the answers you need. With respect to the Honeywell Site 108 work plan, a draft work plan was received and it is my understanding that EPA is providing comments. I can forward you the draft version if that would be helpful.

Best,
Margo

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From: Mucha, Teresa J (DEC) <teresa.mucha@dec.ny.gov>
Sent: Tuesday, November 20, 2018 1:22 PM
To: Ludmer, Margo <ludmer.margo@epa.gov>
Subject: TCC

Hi Margo,



I have a couple questions and wasn't sure who to address them to so I'm sorry to bother you. Did EPA receive the proposal from Honeywell for the Site 108 tanks? We haven't and I thought HW was going to submit something shortly after our last call with them.

Do you know when EPA planned on releasing the air data from the monitoring performed during the shutdown that was discussed during the prior call with the electeds? DEC analyzed the air samples taken by a resident and is thinking of releasing the data shortly. I thought it may make sense to time

the release or do a joint release (along with a reference to the DEC's website with the real time and past air sampling data).

Thanks,
Terri

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